

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION**

KALSHIEX LLC,

Plaintiff,

vs.

JOHN A. MARTIN, et al.,

Defendants.

Case No.: 25-cv-1283-ABA

**JOINT MOTION TO STAY
PROCEEDINGS**

Plaintiff KalshiEX LLC (“Kalshi”) and Defendants John A. Martin, Michael Eaton, Everett D. Browning, Sr., E. Randolph Marriner, Ade Adebisi, Diane Croghan, George L. Doetsch, Jr., Harold E. Hodges, James J. Stakem, Anthony G. Brown, the Maryland Lottery and Gaming Control Agency, and the Maryland Lottery and Gaming Control Commission (collectively, the “parties”), have conferred and now respectfully request that the Court stay all proceedings in this matter pending appeal.

Kalshi previously filed a Complaint (ECF No. 1) and a motion for a temporary restraining order and preliminary injunction (ECF No. 2). On August 1, 2025, this Court issued an Opinion (ECF No. 70) and Order (ECF No. 71) denying Kalshi’s preliminary-injunction motion. That same day, Kalshi appealed that Opinion and Order (ECF No. 72) to the U.S. Court of Appeals for the Fourth Circuit (Docket No. 25-1892). Given that it faced the prospect of criminal and civil liability, Kalshi also moved for an injunction pending appeal. ECF No. 73. Kalshi withdrew that motion after Defendants provided written assurances that they would forgo enforcement of the relevant Maryland laws against Kalshi pending the outcome of Kalshi’s pending appeal in the Fourth Circuit. ECF Nos. 83, 85. That assurance of nonenforcement rendered an injunction pending appeal unnecessary.

Because this Court’s decision denying a preliminary injunction is currently on appeal, a stay of proceedings in this Court would conserve the parties’ and the Court’s resources and advance the interests of judicial economy. The parties therefore respectfully request that all proceedings in this action, including all deadlines, any discovery, pre-trial motions, and trial, shall be stayed pending further order of the Court. The parties propose to file a joint status report within 21 days after the issuance of the Fourth Circuit’s mandate in Kalshi’s appeal.

CONCLUSION

The parties respectfully request that the joint motion to stay proceedings be granted.

Dated this 19th day of August, 2025.

/s/ Neal Kumar Katyal

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